

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

VIRTAMOVE, CORP., <div style="text-align: right; padding-right: 20px;">Plaintiff,</div>	§	
	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)
v.	§	
	§	
HEWLETT PACKARD ENTERPRISE COMPANY, <div style="text-align: right; padding-right: 20px;">Defendant.</div>	§	JURY TRIAL DEMANDED
	§	
	§	
	§	
VIRTAMOVE, CORP., <div style="text-align: right; padding-right: 20px;">Plaintiff,</div>	§	
	§	Case No. 2:24-CV-00064-JRG
	§	(Member Case)
v.	§	
	§	
INTERNATIONAL BUSINESS MACHINES CORP., <div style="text-align: right; padding-right: 20px;">Defendant.</div>	§	JURY TRIAL DEMANDED
	§	
	§	
	§	
	§	

**JOINT MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO COUNTERCLAIMS**

Plaintiff VirtaMove Corp. (“Plaintiff”) and Defendant International Business Machines Corp. (“Defendant”) hereby jointly move for a three-week extension of time for Plaintiff to answer or otherwise respond to Defendant’s counterclaims (Dkt. 115).

Plaintiff’s deadline to answer or otherwise respond to Defendant’s counterclaims is currently due on January 3, 2025 and, with this three-week extension, the deadline would be January 24, 2025. This motion is not being brought for the purpose of delay. This extension is necessary to ensure adequate time for Plaintiff to prepare its response to Defendant’s counterclaims in view of counsels’ other commitments. There have been no other extension requests related to Defendant’s counterclaims.

Counsel for the parties have conferred and all parties stipulate to this extension. Accordingly, the parties request that the Court grant the motion and enter the attached proposed Order.

Dated: December 30, 2024

Respectfully submitted,

By: /s/ Daniel B. Kolko

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Attorneys for Defendant

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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Daniel B. Kolko
Daniel B. Kolko

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on December 30, 2024.

/s/ Daniel B. Kolko
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